

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 21-mj-461

MANUEL THOMAS,

Defendant.

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**JOINT MOTION TO MODIFY PRETRIAL RELEASE CONDITIONS**

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The United States of America, by its attorneys Richard G. Frohling, United States Attorney for the Eastern District of Wisconsin, and Kevin Knight, Assistant United States Attorney, and the defendant, by his counsel Patrick Knight, hereby jointly move the Court to add the following two criteria to defendant's conditions of release:

- Defendant must not possess a firearm, destructive device, or other weapon.
- Defendant must submit to testing for a prohibited substance if required by the pretrial service office or supervising officer. Testing may be used with random frequency and may include urine testing, the wearing of a sweat patch, a remote alcohol testing system and/or any form of prohibited substance screening or testing. The defendant must not obstruct, attempted to obstruct, or tamper with the efficiency and accuracy of prohibited substance screening or testing.

The parties jointly submit that the foregoing conditions are justified in light of recent conversations between the defendant, defense counsel, and counsel for the government.

Dated at Milwaukee, Wisconsin, this 27<sup>th</sup> day of August, 2021.

Respectfully submitted,

RICHARD G. FROHLING  
United States Attorney

By:

/s/ Kevin C. Knight  
Assistant United States Attorney

&

MANUEL THOMAS  
Defendant

By:

/s/ Patrick Knight  
Counsel for Defendant Manuel Thomas